



Governors Highway Safety Association

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Washington DC 20590

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Docket No. NHTSA-2004-16932 - 4
Plan for Evaluating the Effectiveness of Vehicle and Behavioral Programs

Dear Sir or Madam:

Thank you for the opportunity to comment on NHTSA's proposed evaluation plan for 2004-2007. Since the Governors Highway Safety Association is concerned primarily about driver and road user behavior, our comments will be limited to the behavioral portions of the evaluation plan.

The proposed behavioral research outlined in the evaluation plan is on issues that states would find appropriate and useful. In our view, however, there is not enough evaluative research on behavioral issues and a number of issues are not covered.

Increasingly, states are being encouraged by Congress and NHTSA to implement **proven effective** highway safety countermeasures. However, very little behavioral countermeasure evaluative research has been conducted (except on such issues as primary belt laws, .08 BAC legislation and other DUI initiatives) and few programs have been proven effective. As a result, states are compelled to select countermeasures for which there is no clear evidence of effectiveness and no strong research justification. States cannot afford to wait while the Agency evaluates two or three behavioral countermeasures a year. If the states are going to be expected to implement **only** research-based, data-driven programs, then more resources must be devoted to evaluative research.

In addition, GHSA is concerned that, with the exception of two much-needed speed studies, the proposed research narrowly focuses on occupant protection and impaired driving issues. There are no proposals to research the model elements of a graduated drivers license law so that there would be a research-based justification for implementing improvements in state graduated driver licensing laws. There are no plans to research issues concerning older drivers, as delineated in NHTSA's 2001 Older Driver Research Agenda, despite the fact that this population cohort is expected to substantially increase in the next twenty years. NHTSA has not proposed to evaluate the effectiveness of DUI courts even though states are being encouraged to implement these court programs. No research is proposed on young driver programs despite the fact that young drivers continue to be over-represented in crashes. Test refusal is a growing problem, yet there is no planned analysis of state laws that penalize refusers at least as much as those that fail sobriety tests. Congress has a definite interest in drugged driving, yet no research has been proposed on this topic in any year. States spend hundreds of thousands of dollars to train child passenger safety technicians, yet the training has never been formally evaluated to see whether it is effective or whether changes should be made in it. States need help in crafting effective media campaigns on issues where enforcement is not appropriate, such as those targeting children or diverse populations. No research is planned to evaluate such campaigns. The number of suspended and revoked drivers' licenses in states is a substantial portion of total drivers' licenses

in some states. Little research has been conducted to identify effective countermeasures for this growing problem.

GHSA also recommends that any evaluation of behavioral highway safety programs should take costs as well as benefits into account. Increasingly, Congress wants cost-benefit analyses of different highway safety countermeasures, and members of Congress expect states to have such information readily available. However, as the NCHRP 17-18 project implementing the AASHTO Strategic Highway Safety Plan has found, there is little, if any, cost/benefit data for specific highway safety countermeasures, particularly on the behavioral side. As a result, states can't be responsive to Congress and, perhaps more importantly, they have to make spending and programming decisions with inadequate information.

Finally, GHSA recommends changes in the order of the behavioral research that is to be conducted. The New York Stop DWI project scheduled for 2004 should be put on hold. While it is important to encourage state self-sufficient drunk driving programs, there are other, perhaps more pressing and important impaired driving issues that should be researched and take precedence.

Instead, GHSA recommends that the model elements of a graduated driver license program, as outlined in the Dec. 2003 Insurance Institute for Highway Safety (IIHS) report, should be researched. In particular, the optimal age of licensure, the appropriate length of the learner and provisional license stages, the optimal length of supervised on-the-road training, and the role of parents in graduated licensing programs should be researched. As noted previously, this kind of research is urgently needed to convince state legislatures that improvements in a state's graduated driver licensing law are needed.

GHSA also recommends that the evaluation of observed belt use and ejection, planned in 2004, could be delayed. Instead, the analysis of the unique features that raise belt use in California, Washington and Oregon could be moved up to 2004. States with moderately high belt usage that are struggling to make additional improvements would benefit from the experiences of higher belt use states. Similarly, the analysis of speed limits and fatality risk, planned in 2005, could be moved up to 2004. If a national speed workshop is planned in late 2004 or early 2005 to coordinate state and federal speed policy, then the speed analysis could be particularly timely.

GHSA recommends omitting the planned 2006 analysis of factors that encourage communities to devote traffic resources to traffic enforcement. Although such a study might be interesting and even informative, we believe that local fiscal conditions and local budgets have the greatest influence on local decisions to enhance local traffic enforcement activities. The study of factors contributing to speeding could be moved up to 2006 if the local traffic enforcement study is deleted.

GHSA appreciates the opportunity to review the planned research for the next three years. The Association encourages NHTSA to update and publish this plan at regular intervals and to seek public comment on it. Thank you for the opportunity to submit our views on the research agenda.

Sincerely,



Kathryn J.R. Swanson
Director, Minnesota Office of Traffic Safety
Chair, Governors Highway Safety Association